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Counsel for Defendant NOVICK

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUCAS NOVICK,

Defendant.

**Case No.:** CR 23-00017-JD

STIPULATION AND ORDER  
EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT AND REQUEST  
TO CONTINUE HEARING

Lucas Novick is scheduled to appear for a change-of-plea or trial setting hearing in this matter on September 9, 2024, at 10:30 a.m. Defense counsel has been summonsed for jury duty in San Mateo County on September 9, 2024, and is therefore now unavailable on that date. Defense counsel is continuing to review and analyze the discovery produced by the government. Also, since the last update to the Court, defense counsel has provided a mitigation package and proposed resolution to government counsel. The government has responded by extending a plea offer in August 2024. The parties are currently in negotiations about a potential resolution to the charge and require additional time for those discussions. Defense

counsel is requesting to continue the matter to defense counsel's next available date in light of an upcoming trial schedule and a federal holiday. Therefore, the parties jointly request the matter be continued to October 21, 2024, or as soon thereafter as the Court is available.

The parties further stipulate and request that, under the Speedy Trial Act, the Court exclude the time from September 9, 2024, to October 21, 2024. An exclusion is appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), for continuity of counsel and effective preparation of counsel, taking into account the exercise of due diligence. An exclusion of time from September 9, 2024, to October 21, 2024, is also appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as the ends of justice served the granting of such continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

September 5, 2024  
Dated

ISMAIL J. RAMSEY  
United States Attorney  
Northern District of California

/S

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ROLAND CHANG  
Assistant United States Attorney

September 5, 2024  
Dated

JODI LINKER  
Federal Public Defender  
Northern District of California

/S

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SOPHIA WHITING  
Assistant Federal Public Defender

### **ORDER**

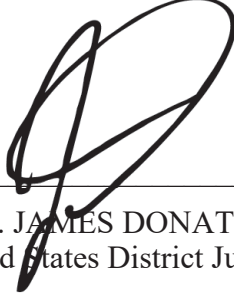
It is hereby ordered that the change of plea or trial setting hearing in this matter be continued from September 9, 2024, to November 4, 2024, and that time will be excluded under 18 U.S.C. § 3161(h)(7)(B)(iv), for continuity of counsel and effective preparation of counsel,

1 taking into account the exercise of due diligence. An exclusion of time from September 9,  
2 2024, to November 4, 2024, is also appropriate under 18 U.S.C. § 3161(h)(7)(B)(iv), as the  
3 ends of justice served by the granting of such continuance outweigh the best interest of the  
4 public and the defendant in a speedy trial.

5 IT IS SO ORDERED.

6  
7 September 6, 2024

8 Dated

  
\_\_\_\_\_  
HON. JAMES DONATO  
United States District Judge